

Alexander D. Pencu (pro hac vice)
 adp@msf-law.com
 Christopher J. Major (pro hac vice)
 cjm@msf-law.com
 Jeffrey P. Weingart (pro hac vice)
 jpw@msf-law.com
MEISTER SEELIG & FEIN PLLC
 125 Park Avenue, 7th Floor
 New York, NY 10017
 Telephone: (212) 655-3500
 Fax: (646) 539-3649

Patricia L. Peden (State Bar No. 206440)
 20-3778@cases.warrenlex.com
WARREN KASH WARREN LLP
 2261 Market Street, No. 606
 San Francisco, California, 94114
 +1 (415) 895-2940
 +1 (415) 895-2964 facsimile

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LYNWOOD INVESTMENTS CY LIMITED,)	Case No. 3:20-cv-03778-MMC
)	
Plaintiff,)	
)	Certification of Urgency
v.)	
)	
MAXIM KONOVALOV, IGOR SYSOEV,)	
ANDREY ALEXEEV, MAXIM DOUNIN,)	
GLEB SMIRNOFF, ANGUS ROBERTSON,)	
NGINX, INC. (BVI), NGINX SOFTWARE,)	
INC., NGINX, INC. (DE), BV NGINX, LLC,)	
RUNA CAPITAL, INC., EVENTURE CAPITAL)	
PARTNERS II LLC and F5 NETWORKS, INC.,)	
)	
Defendants.)	
)	

Pursuant to the Court's October 20, 2025 Order Re Procedures During Government Shutdown, the undersigned counsel of record in the above-captioned matter hereby submit this Certification of Urgency.

The Court's Pretrial Preparation Order of March 10, 2025, bifurcated discovery. The initial phase of discovery, which focuses on whether former Rambler employees wrote software code while they were employed by Rambler that became part of NGINX Plus, is set to close in March 2026, a mere five months away (Dkt. No. 211).

To date, Plaintiff has not received any documents from defendants or third parties in response to its written discovery requests. A primary reason cited by defendants and non-parties for withholding documents is the absence of a protective order. Plaintiff urgently requests that the Court resolve the pending protective order disputes and issue a protective order. This will enable Plaintiff to receive and review documents and prepare for depositions as the Court's March 2026 deadline approaches.

Date: October 27, 2025

Respectfully submitted,

/s/ Alexander D. Pencu

Alexander D. Pencu (pro hac vice)

adp@msf-law.com

Christopher J. Major (pro hac vice)

cjm@msf-law.com

Jeffrey P. Weingart (pro hac vice)

jpw@msf-law.com

MEISTER SEELIG & FEIN PLLC

125 Park Avenue, 7th Floor

New York, NY 10017

Telephone: (212) 655-3500

Fax: (646) 539-3649

Patricia L. Peden (State Bar No. 206440)

20-3778@cases.warrenlex.com

WARREN KASH WARREN LLP

2261 Market Street, No. 606

San Francisco, California, 94114

+1 (415) 895-2940

+1 (415) 895-2964 facsimile

Attorneys for Plaintiff